**Subject:** Re: Second follow-up — ALPR/Flock public records request #26-174, filed June 28, 2026
**Date:** Wednesday, August 5, 2026 at 11:03:15 AM Eastern Daylight Time
**From:** Mark Williams
**To:** Tulchin, Matthew
**CC:** Public Records Request, Nicholson, Tiara
**Attachments:** image001.jpg, image002.jpg, image.png, image.png

Dear Mr. Tulchin:

We write to propose a way to resolve Request #26-174 without litigation. By way of record: we filed the request on June 28, 2026, and followed up on July 13 and July 22. On July 23, 2026 you declined to give any timeframe — citing a "first come, first served" practice and a significant backlog, and noting that the Act sets no fixed deadline — while producing no records, setting no completion date, and identifying no exemption. We replied the same day with a formal demand letter setting out the governing law, and asked for the contract now and the remainder on a rolling basis, with an itemized statutory basis for any withholding, by August 3, 2026. That date has passed with no production and no further communication.

To date, seven constituent institutions of the sixteen-campus UNC System — Western Carolina, NC A&T, NC State, UNC Charlotte, UNC Pembroke, UNC School of the Arts, and Winston-Salem State — have produced records or begun rolling production in response to this identical request, and others have at least acknowledged it and committed to a timeframe. NCCU is the outlier: to date it has declined to commit to any timeframe at all, while producing nothing and citing no exemption.

Rather than proceed directly to a civil action under Chapter 132, we invite the University to resolve this dispute through pre-litigation mediation under N.C. Gen. Stat. § 7A-38.3E(a). That process is consensual, and it is designed for exactly this situation.

Please confirm in writing, by Friday, August 14, 2026, whether North Carolina Central University will agree to voluntary mediation of this dispute. If the University declines, N.C. Gen. Stat. § 7A-38.3E makes mediation mandatory once an action under § 132-9 is filed — so we would simply be reaching the same table after a filing rather than before one. We would prefer to reach it now. The dispute is narrow, and we believe it is resolvable.

Respectfully,

~Mark

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**From:** Mark Williams <mwilliams@ricefamilylaw.com>
**Date:** Thursday, July 23, 2026 at 10:45 AM
**To:** Tulchin, Matthew <[redacted]>

**Cc:** Public Records Request <publicrecordsrequest@NCCU.EDU>; Nicholson, Tiara <[redacted]>
**Subject:** Re: Second follow-up — ALPR/Flock public records request #26-174, filed June 28, 2026

Please see attached

~Mark

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**From:** Tulchin, Matthew <[redacted]>
**Date:** Thursday, July 23, 2026 at 9:06 AM
**To:** Mark Williams <mwilliams@ricefamilylaw.com>
**Cc:** Public Records Request <publicrecordsrequest@NCCU.EDU>; Nicholson, Tiara <[redacted]>
**Subject:** Re: Second follow-up — ALPR/Flock public records request #26-174, filed June 28, 2026

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Mr. Williams,

Thank you for your email. I appreciate your follow-up regarding the status of your public records request.

The University's practice is to process public records requests in the order in which they are received. The Office of Legal Affairs is currently managing a significant backlog of pending public records requests, and numerous requests were received before yours. Consistent with the University's practice, those requests will be addressed before your request.

North Carolina's Public Records Act does not establish a fixed deadline by which a public agency must respond to a public records request. Rather, the Act requires that requests be fulfilled as promptly as possible under the circumstances. The University is processing requests in a manner that is consistent with that obligation.

While we appreciate the comparison, the practices of other constituent institutions are not relevant to the University's handling of your request. Each institution administers its own public records process and operates under different policies, procedures, staffing, resources, and request volumes. Accordingly, the response time of another institution has no bearing on North Carolina Central University's response to your request.

The University will respond to your request in the order in which it was received. While the University endeavors to process public records requests as promptly as practicable and appreciates your patience, it cannot guarantee a specific timeframe for responding to any particular request.

In Truth and Service,

**Matthew Tulchin**
General Counsel

Office of Legal Affairs
Shepard Administration Building, Ste. 218
1801 Fayetteville Street
Durham, NC 27707
Office: (919) 530-7558

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Book time to meet with me

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**From:** Mark Williams <mwilliams@ricefamilylaw.com>
**Sent:** Wednesday, July 22, 2026 7:02 PM
**To:** Tulchin, Matthew <[redacted]>
**Subject:** Second follow-up — ALPR/Flock public records request #26-174, filed June 28, 2026

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This email originated outside of NCCU. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Mr. Tulchin,
I am following up a second time on public-records request **#26-174**, submitted to North Carolina Central University on **June 28, 2026**, concerning the University's automated license plate reader program and its contract with Flock Safety or another ALPR vendor. I sent a first follow-up on **July 13**. I have not received a production or an estimated completion date.
I want to be constructive rather than adversarial, so let me offer the context I have. Two institutions in the UNC System received a materially identical request on the same day and have already produced in full: **UNC School of the Arts produced on July 1 — three days — and North Carolina A&T State University produced on July 9, eleven days.**A&T's Network Audit alone contained 1,390,776 rows. The core records here are documents already in hand and a report generated on demand from the Flock Insights tab; this is not a research project.
N.C. Gen. Stat. § 132-6(a) requires production "as promptly as possible." Twenty-four days, with one follow-up unanswered, is difficult to reconcile with that standard when peer institutions have completed the same request in days.
**To speed things along, I am glad to take production in stages.** The two items of greatest public interest are:

1. The **ALPR vendor contract** — Flock Safety or any other vendor — including any amendments, renewals, or attached terms of service; and
2. The **Flock Network Audit** — Insights tab, most recent three months, exported in native CSV.

If the University produces those two now and the remaining items on a rolling basis, that fully satisfies me for the present. What I am trying to establish is straightforward: what the University agreed to, and which agencies are searching cameras on a public campus and for what stated reason.
Please let me know by **Friday, August 1, 2026** either (a) when production will be complete, or (b) which specific items the University contends are exempt, and the statutory basis for each. If any portion is being withheld, I would appreciate that in writing so the record is clear.
I am glad to speak by phone if that is quicker than correspondence.
Respectfully,
Mark Spencer Williams

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